

POMERANTZ LLP

Brian Calandra
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Facsimile: (917) 463-1044
bcalandra@pomlaw.com

Additional counsel appears in signature block

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TREY GREENE, individually
and on behalf of all others
similarly situated,

Plaintiff,

v.

ZAC PRINCE, FLORI MARQUEZ,
TONY LAURA, JENNIFER HILL and
GEMINI TRADING, LLC,

Defendants.

Case No.: 2:23-cv-01165-KM-LDW

NOTICE OF MOTION

Motion Date: December 18, 2023

**NOTICIE OF PLAINTIFFS' MOTION TO AMEND THE COURT'S LEAD
PLAINTIFF ORDER AND APPOINT AN ADDITIONAL CO-LEAD
PLAINTIFF AND CO-LEAD COUNSEL**

PLEASE TAKE NOTICE that, pursuant to Rules 21 and 54(b) of the Federal Rules of Civil Procedure, and the Court's authority to appoint a lead plaintiff and lead counsel in a securities fraud class action under the Private Securities Litigation

Reform Act of 1995 (“PSLRA”), current Lead Plaintiffs Pham Duy Anh, Dang; Trey Greene; and Arman Reyes (collectively “Greene Plaintiffs”); and Cameron Wyatt (together with Greene Plaintiffs, “Plaintiffs”) jointly will move before the Honorable Kevin McNulty, United States District Judge at the Frank Lautenberg Post Office & U.S. Courthouse, 2 Federal Square, Courtroom PO 04, Newark, New Jersey 07102 on December 18, 2023 for an order

1. Amending the Court’s October 13, 2023 order (ECF No. 15 (“Lead Plaintiff Order”)) to appoint Cameron Wyatt as a Co-Lead Plaintiff under the PSLRA together with the Greene Plaintiffs;
2. Amending the Lead Plaintiff Order to appoint Cameron Wyatt’s counsel, Pomerantz LLP, as Co-Lead Counsel together with Squitieri & Fearon, LLP and Moore Kuehn, PLLC.

In support of this motion, Plaintiffs submit: (1) Memorandum of Law in Support of Plaintiffs’ Motion to Amend the Court’s Lead Plaintiff Order and Appoint an Additional Co-Lead Plaintiff and Co-Lead Counsel; and (2) a Proposed Order.

Defendants Prince, Laura, Marquez, and Hill take no position as to this motion.¹ Accordingly, Plaintiffs request that this Court enter the Proposed Order.

¹ Defendant Gemini Trust Company has not been served. *See* ECF No. 1 at ¶ 18.

Dated: November 16, 2023

POMERANTZ LLP

By: /s/ Brian Calandra

Brian Calandra
Jeremy A. Lieberman
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Fax: (212) 661-8665
Email: jalieberman@pomlaw.com
Email: bcalandra@pomlaw.com

SQUITIERI & FEARON, LLP

By: /s/ Lee Squitieri

Lee Squitieri
305 Broadway, 7th Floor
New York, New York 10007
(212) 421-6492
lee@sfclasslaw.com

*Proposed Co-Lead Counsel for
Proposed Lead Plaintiffs and the Class*

MOORE KUEHN, PLLC

Fletcher Moore
Justin Kuehn
30 Wall Street, 8th Floor
New York, New York 10005
(212) 709-8245
fmoore@moorekuehn.com
jkuehn@moorekuehn.com

**BRONSTEIN, GEWIRTZ &
GROSSMAN, LLC**

Peretz Bronstein
(pro hac vice application forthcoming)
60 East 42nd Street, Suite 4600
New York, New York 10165
Telephone: (212) 697-6484
Facsimile: (212) 697-7296
peretz@bgandg.com

*Additional Counsel for Proposed Co-
Lead Plaintiffs and the Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November 2023, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ *Brian Calandra*
Brian Calandra